

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on )  
behalf of all other similarly situated, )  
Plaintiff, ) Case No. 1:22-cv-06918  
v. ) Hon. Franklin U. Valderrama  
BELKIN INTERNATIONAL, INC., ) Magistrate Judge Gabriel A. Fuentes  
Defendant. )

**JOINT MOTION TO EXTEND EXPERT DISCOVERY DEADLINES**

Pursuant to the Court's order (Dkt 142) and the parties' discussions at the February 6, 2025 hearing on Plaintiff's motion to stay, Plaintiff Dennis Gromov and Defendant Belkin International, Inc. hereby submit the following joint motion to extend expert discovery deadlines.

The parties have served their initial expert disclosures and are in the process of scheduling expert depositions. The expert depositions are being coordinated with a case brought against Belkin that is pending in California where the plaintiff is represented by the same counsel as Plaintiff Gromov here, but Belkin is represented by different counsel. This has made it more difficult to schedule the four depositions of Belkin's experts<sup>1</sup> as four calendars have to be coordinated for each deposition (plaintiffs' counsel, two counsel for Belkin, and the expert), but the parties have now agreed upon dates for the depositions of Belkin's experts in this matter. However, those depositions cannot be completed prior to the existing deadline of February 20 to serve rebuttal expert reports (*See* Dkt. 135) and Plaintiff's counsel wants to take the depositions before rebuttal reports are due.

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<sup>1</sup> Belkin has three experts in this litigation and four in the California litigation.

On January 31, 2025, Plaintiff moved the Court to stay this action in its entirety pending a ruling on Belkin's motion to dismiss. That motion was denied. (See Dkt 142.) However, to accommodate the scheduling conflicts and allow the completion of expert discovery, the parties have agreed and therefore request that the Court order that current remaining deadlines be extended as follows:

- Rebuttal expert report deadline: March 24, 2025
- Close of expert discovery: April 18, 2025.

Dated: February 7, 2025

Respectfully submitted,

/s/ Michael T. Boardman

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*/s/ Bradley F. Silverman*

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